



February 15, 2002

Ms. Kim Ogle, RCRA Project Manager
United States EPA, Region 10
1200 Sixth Avenue
Seattle, WA 98101

Re: February 15, 2002 Progress Report
J. H. Baxter Arlington Facility
Docket No. RCRA-10-2001-0086

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FILE COPY

Dear Ms. Ogle:

This letter provides the February 15, 2002 progress report for work completed under the Administrative Order on Consent (AOC) for the J. H. Baxter facility during the period January 15 to February 15, 2002.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the referenced reporting period, including actions performed and any problems encountered relative to work required by the Order. Significant developments that occurred on this project during this reporting period are outlined below:

- Lysimeters L-1, L-2, and L-3 were sampled in accordance with the State Waste Discharge Permit (SWDP) on December 17, 2001. On January 9, 2002, the contract laboratory (Triangle Laboratories under subcontract to Columbia Analytical Services) notified Baxter that internal standard recoveries were outside acceptable control limits for the dioxin analysis of lysimeter sample L-3. Lysimeter L-3 was resampled for dioxin analysis on January 15, 2002. On February 1, 2002, the laboratory informed Hart Crowser that the laboratory method blank for the resample from lysimeter L-3 contained dioxin contamination requiring all data from this sample to be qualified. On February 11, 2002, the laboratory was directed to finalize the data package from the lysimeter sampling and to include both the December and January results from sample L-3. Lysimeter sampling results from December and January (L-3 resample) have not been received from the laboratory. The validated data package will be submitted to EPA along with the March 2002 Progress Report.





- During the off site drinking water sampling effort that occurred on January 14 and 15, 2002, the following deviations from the first round of sampling were noted:
 - Well 15B01. Bill Bailey constructed a new shed around his water treatment system. The shed blocked access to the only sample location available prior to treatment. With EPA's concurrence this location was not sampled.
 - Well 15A01. The Arlington Cemetery has shutdown and drained their external sprinkler system for the winter; therefore, the outside faucet previously used was not available. With EPA's concurrence a sample was taken from a faucet located inside the well house used to supply a portable wash station.
 - Well 15F03. As part of the commercial truck wash, Glenn Rengen has approximately 600 gallons of water in holding tanks at the wellhead. With EPA's concurrence the volume of these tanks were not purged prior to taking a water sample; however, field parameters were stable.
 - Well 22J01. Roger Perkins indicated that an outside faucet was available for sampling. Previously, the sample was taken from the kitchen sink. As courtesy to his disabled wife, the January 2002 sample was collected from the outside faucet.
 - Well 22H02. Kenneth Root has bought the property from Gene Johnson. This sale was pending during the pervious sampling event. The database has been updated to reflect the new name and mailing address (note: the mailing address is not the same as the well address).
 - Well 15A01. The contact name at the Arlington Cemetery has changed from Randy Wilverding to Erika Morris. The well owner database has been modified accordingly.
- Analytical results from the off-site drinking water sampling performed the week of January 14, 2002, were received from the laboratory (Columbia Analytical Services) and Hart Crowser conducted a quality assurance/quality control (QA/QC) evaluation in accordance with Appendix C to the Drinking Water Sampling and Alternate Water Supply Work Plan, dated May 14, 2001. Pentachlorophenol and tetrachlorophenol were not detected in any of the drinking water samples. The data review summary and laboratory certificates are included as Attachment A to this Progress Report.





- On January 13, 2002, Hart Crowser transmitted drinking water analytical results to each well owner in accordance with Paragraph 51.c. of the AOC. Copies of each letter have been sent to EPA and Baxter.
- Baxter discussed the dioxin treatment limit concerns regarding stormwater with EPA and conducted another review of treatment technologies to determine whether one or more of the technologies may be able to achieve discharge limits specified in Ecology's November 21, 2001, "contained-in" approval letter.
- Baxter received analytical results on the activated carbon used in the process water treatment system. Analytical results are included in Attachment B to this Progress Report.
- Lysimeters L-1, L-2, and L-3 were sampled on February 11, 2002, in accordance with the SWDP.

ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period and includes a schedule of actions to be performed.

- Any final groundwater data from the January 2002 sampling round and February 2002 lysimeter sampling round that are received from the laboratory and validated in accordance with the SWDP requirements will be summarized and forwarded to EPA with the next progress report.
- Baxter is preparing another letter to Ecology regarding the technical feasibility of meeting a 0.6 pg/L TEQ stormwater discharge limit for dioxins/furans. The letter will also propose a path forward to resolve unknowns regarding treatment removal efficiencies.
- The SWDP requires stormwater drains to be sampled every three months. The purpose of this sampling was to determine whether pentachlorophenol is present in the stormwater. The permit requires all drains with confirmed pentachlorophenol detections to be closed as soon as possible. Previous sampling indicates that pentachlorophenol is present in some of the storm drain samples. Baxter has agreed to close the drains. However, the drains cannot be closed until ponding water is gone, which will probably not occur until spring or early summer. Baxter has continued to





collect drain samples but because the drains are going to be closed as soon as possible, the sampling no longer serves a purpose under the SWDP. Therefore, Baxter intends to propose to cease drain sampling. A letter to this effect will be provided to Ms. Jeanne Tran within the next few weeks.

ANTICIPATED PROBLEMS AND PROBLEM RESOLUTION

This section discusses anticipated problems, and planned resolution of past or anticipated problems.

- The stormwater design and treatment removal efficiencies continue to be unresolved. It is hoped that outstanding issues can be resolved with EPA and Ecology over the next month.

OTHER INFORMATION

Any other information relevant to the Order is discussed in this section, including results of any sampling or testing completed within the reporting period.

- No other information relevant to the Order was generated during the reporting period.

CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that





there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: RueAnn Thomas
Name: RueAnn Thomas
Title: Env. Program Director
Date: 2-15-02

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at 541-689-3801.

Sincerely,

A handwritten signature in dark ink, reading 'RueAnn Thomas', with a fluid, cursive style.

RueAnn Thomas
Environmental Programs Director

Attachments:

Attachment A – Drinking Water Data Quality Review and Laboratory Certificates
Attachment B – Activated Carbon Analytical Results

cc: Georgia Baxter, J. H. Baxter
Mary Larson, J. H. Baxter
Sara Beth Watson, Steptoe and Johnson
Will Abercrombie, Hart Crowser Inc.
J. Stephen Barnett, Premier Environmental LLC.

